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RFO Comments to Preliminary Draft Interim Measures/Interim Remedial Action Decision Document for Pond Water Management

Robert Benedetti, Associate General Manager Environmental Restoration Management EG&G Rocky Flats, Inc

On April 30, 1993, the Rocky Flats Office received a draft portion of the subject document under Work Package AA18/12181, milestone 12181051 As discussed in a subsequent meeting between our staffs, the product delivered did not meet agreed upon format and content requirements

General comments on the Draft Pond Water Management IM/IRA document include the following

- The draft outline on the IM/IRA was not followed in the decision document. This outline was mutually agreed upon by both DOE and EG&G
- 2 Data and information obtained during the brainstorm sessions were not incorporated into the draft decision document
- 3 The authors failed to understand the objectives and scope of this document
- 4 The authors tended to editorialize too much in the document.
- 5 No specific recommendations or actions were given in the document, it was too generic in scope
- 6 Key sections in the draft document were incomplete
- 7 The draft document was internally inconsistent throughout the chapters

RFO has scheduled a meeting on Wednesday May 26, 1993, between our staffs in order to review specific comments pertaining to chapters 1-5 in the decision document. For these reasons discussed above RFO does not consider milestone 12181051 to be completed for the purpose of reporting under the Management Control System, please ensure future progress reporting accurately reflects this missed milestone

ADMIN RECORD

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Obviously, it is not our intent to simply ensure continued reporting of the missed milestone. It is our ultimate desire that the EG&G staff be given adequate management support to complete the draft IM/IRA in a timely manner. In that regard, we request that you provide us with a realistic schedule for product completion which will ensure product quality, yet not allow for excessive preparation time resulting in loss of work focus and unnecessary expansion of work time allotted. Be advised, however, that RFO still believes the September, 1993, deliverable for the final draft IM/IRA is reasonable, unless specific arguments can demonstrate otherwise.

Please contact Norma I Castaneda at extension (303) 966-4226 or Gail Hill at extension (303) 966-3424 if you should have any additional questions regarding this pondwater IM/IRA

James K. Hariman

Assistant Manager for Transition and Environmental Restoration

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